



Applied Geotechnical and Environmental Service Corp.

1151 S. Trooper Road, Norristown, Pa. 19403  
215-666-7404

148510

August 8, 1985

U.S. Environmental Protection Agency  
841 Chestnut Building  
Philadelphia, PA 19107

Attn: Stephen R. Wassersug  
Director, Hazardous Waste Management Division

Re: Boyertown Sanitary Disposal  
(3HW11)  
AGES Project No. 42281

Dear Mr. Wassersug:

This letter is in response to your July 24, 1985 letter to Boyertown Sanitary Disposal Co., Inc. in which you request various information. In your letter you reference that your records indicate that Parts A and B of Boyertown's RCRA permit application are currently being reviewed by the Pennsylvania Department of Environmental Resources (PA DER). This is not correct. Boyertown Sanitary Disposal withdrew Part B application approximately one (1) year ago, and will terminate the interim status operating authorization to receive hazardous substances.

Accompanying this letter are descriptive sections which characterize the facility and design drawings which will assist you in understanding the physical layout and operation of the Boyertown Sanitary Disposal Facility. The information includes:

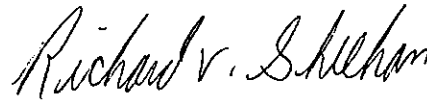
1. A general site description and topographic map.
2. A description of plant operations.
3. A description of waste inspection and monitoring program.
4. Material and waste inventory.
5. Design Drawing No. 42281-E-02 -- Existing Site Plan.
6. Design Drawing No. 42281-E-019 -- General Site Plan.
7. Design Drawing No. 42281-E-020 -- Existing Topography.

The Boyertown Sanitary Disposal Company has no prior history of pollution incidents or releases. Analytical data which characterizes environmental conditions is submitted to PA DER on a quarterly and annual basis.

Please do not hesitate to contact me at (215) 666-7404 if you have any questions.

Sincerely yours,

AGES CROP.

A handwritten signature in cursive script that reads "Richard V. Sheehan".

Richard V. Sheehan

RVS/dwp

Enclosure

cc: Mr. Mike Miller



### GENERAL DESCRIPTION

The Boyertown Sanitary Disposal Co., Inc., landfill is located in Dougless Township, Montgomery County, Pennsylvania, see Figure 1. The landfill has been in existence since the 1960's.

On January 26, 1979 the facility received Solid Waste Permit Number 100550, and on September 20, 1982 the facility received interim status for the treatment, storage, or disposal of hazardous wastes, see Table 1.

The landfill is operated in accordance with the operational requirements of the local, state, and federal governments and the specifications of the approved design. Operations are conducted in accordance with the approved operating plan.

Residential wastes account for the greatest volume, approximately 200 tons per day. Commercial wastes that are disposed of account for approximately 150 tons per day, and industrial wastes account for approximately 350 tons per week.

Boyertown is currently authorized to accept just one (1) hazardous waste stream. Boyertown accepts this waste, an industrial wastewater treatment sludge from the generator, Waste Conversion, Inc. of Hatfield Township, Montgomery County. The sludge is transported to Boyertown in watertight 30 yard roll-off containers five days a week, from 7:00 A.M. to 5:00 P.M. The sludge is applied to the working face, spread, and covered with a layer of soil.





Ref. U.S. GEOLOGICAL SURVEY'S 7.5 MINUTE  
 SERIES QUADS, BOYERTOWN, PA., AND  
 BASSAMANSVILLE, PA. : 1957  
 (PHOTOREV. 1968, 1973)

BOYERTOWN SANITARY  
 DISPOSAL CO., INC.

SITE LOCATION

**AGE**<sup>®</sup>

Applied Geotechnical and Environmental Service Corp.

SCALE  
 1" = 2000'  
 PROJECT NO.  
 42281

DRAWN BY  
 D.W.E.  
 APPROVED BY

DATE

DRAWING NO.

SHEET NO. \_\_\_\_ of \_\_\_\_



### PLANT OPERATIONS

Potential spills may occur:

- 1) At Waste Conversion, Inc., the generator, during the loading of the watertight roll-off containers
- 2) Enroute while transporting the sludge to the landfill
- 3) On site along the access road at the landfill

The possible causes for potential spills are traffic accidents and mechanical failure. These factors are mitigated by the inspection, monitoring, and preventative maintenance programs, employee training, and drive safety awareness.

In the event of an emergency situation of spill, Boyertown Disposal Co, Inc. will contact the appropriate contractor(s) to dispatch emergency response units with all the necessary clean-up equipment for rapidly removing pollution hazards. These contractors and the equipment available for containment, clean-up, and transportation for disposal of spills are listed under Arrangements with Emergency Response Contractors.

Also, in the event of an emergency or a spill, Boyertown Disposal Co., Inc., will immediately notify the appropriate response agency, the affected municipality, and gather necessary information for a detailed written report, as required, to be sent to the U.S. Department of Environmental Resources, and to Waste Conversion, Inc., the generator of the waste.

Detailed mitigation measures are described in the attached Contingency Plan for Transportation of Hazardous Waste.

The only other potential spill situation, which could occur, is associated with storage, treatment, and discharge of leachate.

On-site treatment of the leachate results in a sludge material. This sludge is collected by pump truck, returned to the lined landfill, and applied to the working face, spread, and covered with a layer of soil. All aspects of this process are supervised by trained landfill employees.

In the event of blockage of the discharge system which serves the landfill, the leachate would back-up into the aeration tank and then into the lagoon. This would not cause a problem since the lagoon generally has two (2) to four (4) weeks of capacity available.

If service were interrupted for an extended period of time, the leachate would be trucked to an appropriate off-site discharge point.

In such an event, the leachate loading procedure would be accomplished by the use of pump trucks which would park in a designated area at the treatment facility. The leachate would be removed directly from the settling tank and deposited in the truck's tank compartment which has a capacity of approximately 6,000 gallons. The leachate would then be delivered to one of three treatment facilities. Waste Conversion Inc., Chem-Clear in Chester, Pennsylvania, and Dupont in New Jersey. A trained landfill employee would supervise the entire leachate loading operation. Leachate unloading is not performed at Boyertown Disposal Company, Inc.



INSPECTION AND MONITORING PROGRAM

1. Each truck, roll-off container, and all other equipment used to transport and dispose of the Waste Conversion sludge is inspected daily. All observed deficiencies are promptly corrected. In addition, the vehicles themselves undergo routine state inspections, and are maintained according to DOT standards;
- 2) Monitoring of the effectiveness of the housekeeping practices is performed daily.
- 3) The landfill liner is inspected during installation for punctures, rips, or other damages, and for properly sealed joints. All identified damages or deficiencies are immediately repaired and inspected again. Installation of the liner is in accordance with Department of Environmental Resources regulations
- 4) Visual inspections of the disposal area for indications of leachate seepage from the liner and/or leachate collection piping system are performed daily. A contingency plan to properly contain, control, and collect such outbreaks is in existence for all areas of the landfill
- 5) The landfill receives daily inspections for proper soil cover application
- 6) Visual inspections of the leachate collection lagoon, aeration-settling tank, aerating system, and metering pit to the sanitary sewer system are conducted daily for leaks, seeps, overflows, and overall performance. Flow is monitored by

a recorder located within the blower-house of the secured compound containing the aeration system.

- 7) Visual inspections for evidence of spilled materials, leaks, seeps, and overflows on the access road and in the maintenance, parking and unloading areas are also performed daily
- 8) The perimeter fencing, no trespassing signs, and lighting systems are inspected weekly for potential security problems
- 9) Landfill groundwater monitoring wells are sampled quarterly and annually to monitor overall groundwater quality
- 10) Laboratory analysis of the Waste Conversion sludge is performed weekly
- 11) Laboratory analysis of the leachate in the lagoon and/or the aeration-settling tank is performed monthly
- 12) Results of the sludge and leachate analyses are kept on file at the Boyertown Disposal Co., Inc. office.



### MATERIAL AND WASTE INVENTORY

The Boyertown Sanitary Disposal Company transports and disposes only one "Hazardous or Residual Waste Stream", an industrial sludge from Waste Conversion, Inc. The process description for the Waste Conversion, Inc. treatment facility is as follows:

Wastes are unloaded to the appropriate storage vessels or reactors depending on the existing plant situation and the proposed treatment regimen.

Chemicals (lime, carbon, potassium, permanganate, chlorine, sodium bisulfite) are added to the reactor vessel while the batch is being mixed. The amount of chemicals is determined by the plant lab technicians, based on treatment procedures provided by the Technical Director. After neutralization and other reactions have been attained (final pH will differ based on waste composition), sodium sulfide is added for additional heavy metal removal and precipitation. This is followed by the addition of a polyelectrolyte which enlarges the floc and enhances the settling characteristics of the slurry.

Reactor agitation is now stopped and the slurry is allowed to remain undisturbed for a minimum of 30 minutes. After this time, the supernate, if any, is checked for clarity and suspended solids. If clarity and solids are satisfactory, the supernate is discharged directly to the sewer. If not satisfactory, the entire reaction slurry is filtered through a rotary drum vacuum filter.

If no sludge settlement occurs, the entire batch is transferred to a sludge holding tank for subsequent filtration, as described above.

The rotary drum vacuum filter discharge (filter cake) is hauled to landfill and the clear filtrate is pumped to the sewer.

The identification number for this waste stream is K063.

There are no known compatability problems associated with this waste stream.